

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

PLAINTIFF: RAYMOND E. CARR

V.

CIVIL ACTION NO. \_\_\_\_\_

DEFENDANT: MARGOT BURBIN, DIRECTOR SALVATION ARMY, ET AL

ORIGINAL COMPLAINT

RAYMOND E. CARR  
LORD OF THE STREETS  
3401 FANNIN ST.  
HOUSTON, TX 77004

ADDRESS OF DEFENDANT

1) SALVATION ARMY Harbor Light CENTER  
2407 N. MAIN  
HOUSTON, TX 77009

## JURISDICTION

THE COURT JURISDICTION IS INVOKED UNDER 28 USC § 1331, 1332, 1367, AND ARTICLE 3 OF THE U.S. CONSTITUTION.

## STATEMENT OF FACTS

I AM FILING THIS LAWSUIT AGAINST THE STAFF AT THE SALVATION ARMY HARBOR LIGHT CENTER FOR ENTERING THE CONSPIRACY DESIGNED AGAINST THE PLAINTIFF TO OPPRESS, HUMILIATE, AND INFLICT SEVERE EMOTIONAL DISTRESS, MALICIOUS HAZING, AND ON-GOING HARASSMENT IN VIOLATION OF THE AMERICANS WITH DISABILITIES ACT OF 1990, REHABILITATION ACT OF 1973, AND 14TH AMENDMENT EQUAL PROTECTION OF LAW. ALSO SEE CIVIL CONSPIRACY STATUTE 42 USC § 1985

## STATEMENT OF THE CASE

ON DECEMBER 21, 2017, I WAS RELEASED FROM THE AUSTIN TRANSITIONAL CENTER DUE TO DISCHARGING MY SENTENCE AND CAME TO HOUSTON TO THE SALVATION ARMY SHELTER. UPON MY ARRIVAL THE SALVATION ARMY STAFF IMMEDIATELY TREATED ME ARBITRARILY AND UNFAIR BY REPEATEDLY WRITING PLAVE DISCIPLINARY REPORTS IN AN ATTEMPT TO HAVE ME OUSTED FROM THE PROGRAM I ENROLLED IN. THEY ALSO CHANGED THE PROGRAM POLICY, WEIGHT ROOM ACTIVITY, AND OTHER MEASURES TO INVADDED MY PRIVACY, AND WORK AGAINST MY PERSONAL INTEREST AND REHABILITATION. FURTHERMORE, THE STAFF INCITED RESIDENTS TO HARASS, INTIMIDATE, HUMILIATE, AND SUBJECT ME TO MALICIOUS HAZING, AND MY KITCHEN SUPERVISOR REPEATEDLY WROTE PLAVE DISCIPLINARY REPORTS TO HAVE ME KICK-OUT THE PROGRAM. THEIR LAST ATTEMPT TO PUT ME OUT INTO THE STREET WAS ON 8/9/18, WHEN ONE OF THE STAFF MEMBERS LIED AND TOLD ME HE WOULD WORK-OUT A PLAN THAT WOULD ALLOW ME TO STAY BUT ON 8/15/18, HE CAME ALL A SUDDEN AND GAVE ME ANOTHER NOTICE ORDERING ME TO LEAVE ON 8/17/18. THE GRIEVANCE THAT I FILED WAS RECKLESSLY DISREGARDED WHICH A COPY OF THE NOTICE AND GRIEVANCE ARE ATTACHED AS EXHIBITS A & B.

RELIEF Sought

A REASONABLE AMOUNT IN DAMAGES FOR THE MENTAL, EMOTIONAL, AND  
psychological abuse inflicted.

Raymond Earl Carr  
signature

DATE EXECUTED: AUGUST 17, 2018

RAYMOND E. CARR  
LORD OF THE STREETS  
3401 FINNIN ST.  
HOUSTON, TX 77004

## Salvation Army Harbor Light Complaint Form

Date: 6 / 27 / 18Complainant's Name: RAYMOND CARR

## Description of Complaint:

ON 6/27/18, I WENT IN THE KITCHEN TO HEAT-UP MY COFFEE AS I DO EVERY-DAY BECAUSE I WORK THERE. BUT THIS TIME I WAS MET WITH HARASSMENT FROM THE KITCHEN SUPERVISOR MR. JOHN AND RESIDENT EMPLOYEES WHO STATED "YOU NEED TO QUIT COMING IN THE KITCHEN TO HEAT-UP COFFEE" I THEN TOLD MR. JOHN I COME HERE ON A DAILY BASIS AND I AM NOT THE ONLY ONE WHO COMES IN HERE. HE THEN STATED YOU NEVER DO ANY WORK AND YOU WANT TO COME IN HERE BECAUSE FROM NOW ON YOU DON'T WORK HERE ANYMORE. THIS IS THIRD OUTRIGHT LIE BY MR. JOHN (AND OTHER EMPLOYEES) ATTEMPT TO CAUSE ME HARM AND HAVE ME PUT OUT THE PROGRAM WHICH THE OTHER TWO ATTEMPTS WAS IN DISCIPLINARY ACTION THAT IS ON FILE. MY CO-WORKER LARRY IS A WITNESS TO HIS LIES IF HE IS HONEST ENOUGH TO TELL THE TRUTH. SEE TITLE VII OF THE CIVIL RIGHTS ACT OF 1964, AND THE AMERICAN WITH DISABILITIES ACT OF 1990.



EXHIBIT B

ENTRY 1/4/18

3000

Exit Notification

HMS # 184819

Resident Name: Raymond Carr

You are being given this exit notice because:

- ☐ You have accomplished a successful housing and/or exit plan.
- ☒ You are not eligible for further extensions to stay in shelter.
- ☐ You have excessively violated the rules and regulations.
- ☐ Other: \_\_\_\_\_

You have until the following date to move from our shelter:

Final Exit Date: 8-17-18

Can return after 60 Days or  
with a letter from  
Housing/Case manager

REMINDER

If you disagree with this notice, please notify your case manager within 48 hours to schedule an appeal with the Lead case manager.

The following checklist will help you in a successful exit:

- ☐ Schedule assistance with transportation at least a week in advance through case manager.
- ☐ The morning of your exit, turn in all shelter issued linens and supplies.
- ☐ Ensure all personal items are packed and removed from your room by 12 noon.
- ☐ A Resident Inventory must be completed prior to your scheduled move out.

Kevin Walsh 7-31-18  
Case Manager Signature and Date:

PARTICIPANT: \_\_\_\_\_  
Date: \_\_\_\_\_

Leon Gaymon 7-31-18  
Lead case manager Signature and Date: